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and return by mail to:*

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Bozeman, MT 59771-6580

Jul 30, 2015 02:28 PM

OFFICIAL RECORDS  
Ernest J. Dronenburg, Jr.,  
SAN DIEGO COUNTY RECORDER  
FEES: \$33.00

PAGES: 7

NOTICE OF PENDENCY OF ACTION

re: 543 Camino De Orchidia, Encinitas, CA, 92024-3817

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Attorneys for Joseph V. Womack, Trustee

UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF MONTANA

In re

JOHN HENRY SCHNEIDER,

Debtor.

Case No. 14-61357

JOSEPH V. WOMACK, AS CHAPTER 7  
TRUSTEE FOR THE BANKRUPTCY  
ESTATE OF JOHN HENRY  
SCHNEIDER,

Plaintiff,

v.

SCHNEIDER LIMITED  
PARTNERSHIP, et al.;

Defendants.

Adversary No. 15-00015

NOTICE OF PENDENCY  
OF ACTION

NOTICE IS HEREBY GIVEN, pursuant to Cal. Code Civ. Proc. § 405, *et seq.*, that Joseph V. Womack, Chapter 7 Trustee for the Bankruptcy Estate of John Henry Schneider, has filed an action against the above named defendants in the above-entitled Court. This is an action to unravel a fraudulent scheme whereby Debtor John Henry Schneider, with the assistance of members of his family, attempted to employ a web of entities, trusts and transfers to hide his personal assets from creditors, including certain real property situated in San Diego County, California. The object of the action is to recover property, including the real property described below, for the Bankruptcy Estate in order to pay creditors of the Debtor. The record owner of the property affected hereby is MedPort, LLC, according to the latest San Diego County tax assessment roll. The affected property is located at 543 Camino De Orchidia, Encinitas, CA, 92024-3817 (Assessor's Parcel Number 258-142-21-00), which is more particularly described as follows:

Lot 1 of Parcel Map No. 18618, in the City of Encinitas, County of San Diego, State of California, Filed in the Office of the County Recorder, December 29, 2000 as File No. 2000-0716219 of Official Records.

The parties to the action are as follows:

1. Plaintiff Joseph V. Womack ("Trustee") was appointed to serve as the Chapter 7 Trustee for the Bankruptcy Estate of John Henry Schneider on December 4, 2014. Pursuant to 11 U.S.C. § 541, the debtor's assets have been transferred to the Bankruptcy Estate, which is administered by the Trustee.
2. John Henry Schneider is an individual and the debtor in the related bankruptcy case. John Henry Schneider ("Debtor") filed the present voluntary Chapter 7 petition on December 4, 2014. He is also the grantor and Trustee of the John

Schneider Revocable Trust Dated November 20, 2007 (the "John Trust"), a self-settled, revocable trust formed by Debtor on November 20, 2007. He also controls, owns, and/or has an ownership interest in several other defendant entities, as set forth below.

3. Defendant Michelle R. Schneider is an individual and the wife of Debtor. She is also the grantor and Trustee of the Michelle Schneider Revocable Trust Dated November 20, 2007 (the "Michelle Trust"), a self-settled revocable trust formed by or at the direction of Debtor on November 20, 2007. She is also presently the Trustee of the Brandon Schneider Benefit Trust, dated March 30, 2012, the Shannon Schneider Benefit Trust, dated March 30, 2012, and the Caitlin Schneider Benefit Trust, dated March 30, 2012, a set of purported irrevocable trusts formed by or at the direction of Debtor for the nominal benefit of Debtor and Michelle's children (collectively the "Children's Trusts"). She also has a nominal ownership interest in, and/or management authority, over several of Debtor's other entities, as set forth below, and helps to conduct their business at Debtor's direction.

4. Defendant Kathleen T. Burrows ("Burrows" or "Kathleen Burrows") is an individual residing in Chino Hills, California. She is the sister of the Debtor. Burrows previously served as the Trustee of the Children's Trusts and has (or had) a nominal ownership interest in, and/or management authority over, several of Debtor's other entities, as set forth below, and helps (or helped) to conduct their business at Debtor's direction.

5. Defendant Schneider Management, LLC ("Schneider Management"), is a Wyoming limited liability company formed by or at the direction of Debtor on or about November 20, 2007. The members of Schneider Management are Debtor and Michelle



Schneider, either directly or through the John and Michelle Trusts, respectively. Debtor and Michelle Schneider were the original co-managers of Schneider Management. Debtor became the sole manager as of November 1, 2011, before resigning that station to Kathleen Burrows on March 30, 2012. Burrows was removed as manager on April 17, 2015, and Michelle Schneider is presently the manager of Schneider Management.

6. Defendant Schneider Limited Partnership ("Schneider LP") is a Wyoming limited partnership formed by or at the direction of Debtor on or about November 20, 2007, in which Debtor, through the John Trust, held and continues to hold, at minimum, a 49.5% limited partner interest. Debtor's wife, Michelle, through the Michelle Trust, also held and continues to hold, at most, a 49.5% limited partner interest in Schneider LP. The other 1% of Schneider LP was and is held by Schneider Management, LLC, as the general partner.

7. Defendant MedPort, LLC ("MedPort") is a Wyoming limited liability company formed on or about May 1, 2012. Originally, Brandon Schneider, Debtor's son, and Burrows were the members of MedPort. However, through various transfers, for which no consideration was given, the Children's Trusts are now the sole owners/members of MedPort. MedPort was funded solely by Debtor and/or Schneider LP. None of the actual current or past members of MedPort ever made any capital contributions. Burrows is, or was, the manager.

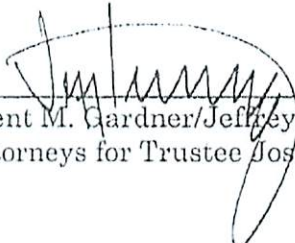
8. Defendant BSC, LLC ("BSC"), is a Wyoming limited liability company formed by Debtor and of which Debtor was the manager. The members of BSC were originally Debtor's three minor children. However, in 2008, Debtor attempted to

retroactively name himself and his wife, Michelle, as members, and then transferred ownership to Schneider LP. At all times, Debtor controlled BSC.

9. Defendants John Does 1-10 and XYZ Corps. 1-10 are people and entities, presently unknown, who/which participated in the wrongful actions alleged in the above-captioned Adversary Proceeding, including those that have rendered financial and/or legal advice in furtherance of Debtor's fraudulent schemes, and who/which will be named in an amended pleading when they are identified.

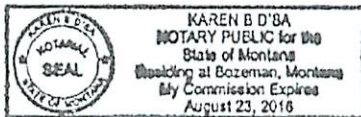
DATED this 22nd day of July, 2015.

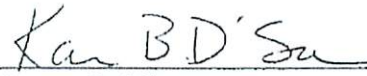
GOETZ, BALDWIN & GEDDES, P.C.

  
Trent M. Gardner/Jeffrey J. Tierney  
Attorneys for Trustee Joseph V. Womack

STATE OF MONTANA                    )  
  ) ss  
County of Gallatin                    )

ACKNOWLEDGED before me this 22nd day of July, 2015, by Jeffrey J. Tierney.



  
Notary Public

(NOTARIAL SEAL)

## CERTIFICATE OF SERVICE

The undersigned hereby certifies that, prior to recordation, a copy of the foregoing notice was served on the record owner of the affected real property and on the other parties to whom the real property claim is believed to be adverse, as set forth below.

■ U.S. Mail (Certified)

☐ Federal Express

☐ Hand-Delivery

☐ Via fax:

☐ E-mail:

MedPort, LLC

c/o Michael D. Greear, registered agent

Greear Clark King, P.C.

1112 Robertson Ave.

P.O. Box 552

Worland, WY 82401

■ U.S. Mail (Certified)

☐ Federal Express

☐ Hand-Delivery

☐ Via fax:

☐ E-mail:

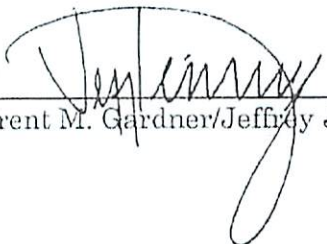
Harold V. Dye

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120 Hickory Street, Suite B

Missoula, MT 59801

*Attorney for John Henry Schneider*



Trent M. Gardner/Jeffrey J. Tierney